

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-12480-JTD

(Joint Administration)

REQUEST FOR SERVICE OF NOTICES

PLEASE TAKE NOTICE that the undersigned appears as counsel for **New Westgate Mall LLC** (“Westgate”) and, pursuant to Bankruptcy Rules 9010, 3017 and 2002 and Bankruptcy Code Section 1109(b), requests that all notices given or required to be given in this case and all papers served in this case be given to and served upon the undersigned at the office and address set forth below.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, orders and notices of any application, motions, petitions, pleadings, requests, disclosure statements and motions to approve same, complaints or demands, whether formal or informal, written or oral, and whether served by mail, telephone, telecopier or otherwise: (1) which may directly, or indirectly, affect or seek to affect any rights or interests of Westgate with respect to (a) the Debtors, (b) property or proceeds thereof in which the Debtors may claim an interest, or (c) property or proceeds thereof in possession, custody or control of Westgate, which the Debtors may seek to use; or (2) which require or seek to require any act, delivery of

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy’s Newco, LLC (5404), Buddy’s Franchising and Licensing LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260), Franchise Group Newco BHF, LLC (4123), Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies “Plus”, LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising, LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors’ headquarters is located at 109 Innovation Court, Suite J, Delaware. Ohio 43015.

any property, payment or other conduct by Westgate; or (3) which may otherwise affect the Debtors or the property of the Debtors.

This filing does not constitute consent to jurisdiction or venue in the United States Bankruptcy Court for the District of Delaware and does not constitute a waiver of any rights including the right to trial by jury.

Respectfully submitted,

NEW WESTGATE MALL LLC

By its counsel,

/s/ Shannah L. Colbert

Shannah L. Colbert, BBO #712955
Mirick, O'Connell, DeMallie & Lougee, LLP
1800 West Park Dr., Suite 400
Westborough, MA 01581
Phone: 508.898.1501
Fax: 508.898.1502
Email: scolbert@mirickoconnell.com

Dated: November 6, 2024

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2024, the foregoing document was filed with the United States Bankruptcy Court – District of Delaware and served upon all parties entitled to receive notice of filings in the above-captioned proceeding via the Bankruptcy Court's Electronic Case Filing (ECF) system.

Dated: November 6, 2024

/s/ Shannah L. Colbert

Shannah L. Colbert, Esq.